

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF SARAH T. ABBEY

SARAH T. (otherwise known as “Sally”) ABBEY declares, pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration, or I have learned said facts to speak on behalf of Seventeen magazine (“Seventeen”).
2. I am the Executive Managing Editor of Seventeen. I have worked in the magazine industry since 1994. I have been employed by Hearst for approximately four years and have served as the Executive Managing Editor of Seventeen since September, 2010. Prior to working at Seventeen, I was the Managing Editor of two Hearst publications, O, The Oprah Magazine, and CosmoGirl.
3. Seventeen is a magazine that targets teenage girls as its audience and generally has articles about love, fashion, beauty, school and health. Our employees work collaboratively to put out the magazine, but employees are segregated into six different departments: Beauty, Fashion, Features, Art, Photo and Administration.

4. Seventeen does not have a paid internship program, nor has it had one in the past six years. I am familiar with the magazine's unpaid internship program; it is a prestigious program that provides college students with the extraordinary opportunity of learning how the magazine is produced.

5. It is important to Seventeen's brand to teach its readers – high school and college students – about careers, one of which is working in the magazine industry. We have the opportunity to extend this teaching from the pages of the magazine into real life through our internship program.

6. Seventeen actively recruits interns by contacting the career services departments at local universities and by uploading postings to Seventeen's website and Ed2010, a website for students who are interested in pursuing careers in the magazine industry and online media.

7. To participate in Seventeen's internship program, students are required to receive college credit for their time spent at the magazine. Students are not permitted to participate in the Seventeen internship program if they are not receiving college credit. Seventeen's interns are told that the positions are unpaid and they understand they are not entitled to a job at the end of the internship.

8. Generally, Seventeen interns spend one "semester" interning: either during fall (approximately September through mid-December), spring (approximately January through mid-May), or summer (approximately June through mid-August). I strongly discourage editors from working with the same student for more than one semester because I think that other students should have the opportunity to learn about the magazine. In addition, I believe that at the end of a semester internship the students are prepared to perform the tasks of an entry-level employee.

9. Each department at Seventeen is independently responsible for selecting and managing interns. In the Beauty, Fashion, Art and Photo departments, the Assistants (entry-level employees who recently graduated from college) conduct the interviews and decide which candidates will be given internships based in great part on their passion for learning about the magazine industry and their enthusiasm for the department for which they would like to intern. In the Features department, the Assistant to the Editor in Chief conducts the first round of interviews and then recommends candidates to be interviewed by the Editors, again based in great part on their passion for learning about the magazine industry and their enthusiasm for the department.

10. Interns in the Beauty, Fashion, Art and Photo departments are closely supervised by the Assistants in those departments. Interns in the Features department are closely supervised by Editors because the only Assistant in the department at this time is the Assistant to the Editor in Chief, and her priority is to assist Ann Shoket.

11. Our Fashion department typically has 15 interns during the summer semester and about 10 interns during the spring and fall semesters. The summer semester interns are generally here five days per week from about 10:00 a.m. to 5:00 p.m. The spring and fall semester interns are generally here 2-3 days per week and choose their hours depending on their individual class schedules, so that they are in our offices only when they are not due in class or have other schoolwork.

12. The Beauty, Photo and Art departments typically have 2 or 3 interns each semester. The Features department has approximately 5 interns each semester.

13. Seventeen's goal is for its interns to be provided with collaborative hands-on training and guidance during 100% of their interning hours by spending time with assistants and

editors. The purpose of the internship program is to train interns to perform the tasks they would perform if they were to secure an entry level job at a magazine after college.

14. In furtherance of this goal, interns attend lunch-time information sessions approximately once a month where Seventeen's editors describe their job duties and career experiences. Interns are given the opportunity to ask questions and interact with the editors at these sessions.

15. The tasks of the interns differ depending on the intern's assigned department.

16. Fashion interns train with the assistants in Seventeen's Fashion Closet to organize clothing for photo shoots. They coordinate with companies to secure clothing and accessories samples and track the delivery and receipt of the samples. Interns also train with the Fashion assistants to ensure that the appropriate editor reviews the samples and that the samples are safely returned to the company. Interns also observe photo shoots and Fashion department meetings where the editors discuss upcoming stories and brands that the magazine will feature.

17. Beauty interns perform similar tasks to the Fashion interns except they organize and track beauty products that the magazine is testing or using for a photo shoot. The Beauty interns also observe photo shoots and Beauty department meetings.

18. Photo interns archive images from the magazine photo shoots so that the design team can search for and access images to use in the magazine. Photo interns also spend their time with the Photo assistant to ensure that the magazine has the correct information for photo credits. They also observe Photo department meetings and occasionally photo shoots.

19. Art interns collaborate with the Art assistant who designs layouts. Art interns observe team meetings and familiarize themselves with the computer software programs used by the magazine to format the publication.

20. Features interns spend time with editors learning how to obtain background information for magazine articles and sometimes post on the magazine's blog.

21. Although Seventeen's interns train in some of the same general areas as the interns at O, The Oprah Magazine, where I previously was the Managing Editor, the internships at the two magazines are different. The experiences of the interns vary because the magazines themselves are different in mission and focus. For example, a Features intern at Seventeen may do reporting that involves gathering quotes and information from college-age men, while an editorial intern at O might do reporting that involves gathering quotes and information from doctors or other professionals who are experts in their fields. The two types of reporting require different knowledge and different skill sets. The writing and editorial decision-making that interns observe at each magazine are also different.

22. During a Seventeen internship, an intern receives training and educational experiences both by virtue of the tasks that he/she performs and the first-hand observation of how a magazine is produced. Interns also learn how to interact with colleagues in a professional environment and are given the chance to network with Seventeen's editors. This networking opportunity is extremely important for interns who are considering pursuing a career in the magazine industry because they may be able to rely on editors to provide employment recommendations. Because entry-level employment opportunities in the magazine industry are extremely competitive, a strong recommendation from a Seventeen editor is a tremendous advantage for students seeking employment after college.

23. I believe that having an internship at a magazine of Seventeen's caliber offers a big boost to someone attempting to secure an entry-level job in the magazine world. In fact, many current Seventeen employees were interns at magazines when they were in college.

24. When I receive an employment application, I view prior internship experience as a plus. In addition to the experience that the internship provides, securing an internship shows that the candidate knew that they were interested in pursuing a career in the magazine industry and that they are passionate about the industry. Additionally, when I interview candidates for employee positions at Seventeen, if the candidate previously interned at a magazine, whether it was a Hearst magazine or not, I am often told in such interviews that the magazine internship helped the candidate figure out what he/she did or did not want to do in his/her career. For example, I recently had two employee candidates who had prior internships in fashion closets at other magazines tell me in their interviews that interning in the fashion closet helped them realize they did not want to work in the Fashion department when they applied for a job and that they did want to work in the Features or another department at a magazine.

25. I know the benefits of an internship first hand because I was an unpaid copy-editing intern when I was pursuing my graduate degree in journalism. I am confident that my internship experience helped set me on my career path because of the training that I received and the contacts that I made. I have no doubt that Seventeen's internship program provides the same benefits that I enjoyed.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 29 day of March 2012, in New York, New York.



SARAH T. ABBEY

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG and ERIN SPENCER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF ALYSSA AFUANG

ALYSSA AFUANG declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I have worked for a global advertising agency since approximately May 2011 as a Human Resources Associate. Prior to this, I was employed as a Human Resources Administrative Assistant at an international law firm from June 2009 to May 2011.
3. I interned in Hearst Magazines' Human Resources department from January to June 2008. At the time of my internship, I was a junior at the City University of New York—Baruch College, majoring in Human Resources Management. Completing at least one internship was a graduation requirement for my major. I applied for the internship not only to fulfill my graduation requirements, but also to gain first-hand experience in human resources, a field I was considering as a career. I don't recall the exact number of academic credits I received, but I

believe I received three academic credits for my internship. I was also required to secure a written evaluation from my supervisor at the end of the internship to submit to Baruch College. The internship was graded "pass/fail" and I passed.

4. It was clear from my initial interview that the internship would be unpaid and for academic credit only. While I knew that an internship did not guarantee subsequent employment, I hoped that my supervisor would provide me with a reference or letter of recommendation if I worked hard and proved myself. My internship was two days a week and my hours were typically 9 a.m. to 5 p.m. I always took an hour for lunch and never stayed past 5 p.m. My supervisor always understood if I ever needed to leave early in order to arrive at my night classes on time. At the time of my internship, I was the only intern in the Human Resources department.

5. Throughout my internship, I was closely supervised by Associate Manager of Human Resources Amy Helmus. Amy gave me constructive feedback throughout the internship on each of the projects I helped her with and was always available to answer any questions I had. The projects I assisted Amy with were organizational as well as substantive in nature, but all gave me helpful insight into the human resources field. Among the tasks I performed were placing internship postings online for the various Hearst magazines and departments, updating employee benefits information on the Hearst website and preparing new hire packets.

6. I was also able to shadow Amy on interviews with job candidates and helped her take notes. We would debrief after each interview and Amy would provide me with useful tips on how to effectively conduct interviews with job applicants. Accompanying Amy to interviews and discussing them with her afterwards was one of the most valuable features of my internship, as it allowed me to get a better sense of what questions to ask during an interview and how to

structure an interview to help it flow better. Another beneficial aspect of my internship was that Amy allowed me to conduct reference checks and write memos summarizing what I had learned about each applicant from these sources. I had never conducted reference checks before, and getting experience with this process helped me learn how to ask detailed questions and the importance of getting as much information as possible about an applicant from their references. I received very detailed feedback from Amy about the memos I drafted and the importance of summarizing the reference checks in my own words rather than according to a set formula. My memo drafting skills improved a lot as a result.

7. Aside from assisting Amy with these tasks, I was also involved in the planning process for Take Your Child to Work Day, a company-wide event that the Human Resources department was responsible for coordinating. Amy and I attended several meetings where we brainstormed potential activities for the event. I also had a chance to help on the day of the event by serving as a tour guide for the children who were participating. I showed the children around Hearst Tower and answered any questions that they had.

8. My internship was an extremely educational experience and, in fact, I learned a lot more than I expected. I had completed one human resources internship prior to my Hearst internship and in that role I had mostly performed administrative tasks such as filing and data entry. In my Hearst internship, by contrast, I had a lot of hands-on experience that helped me learn much more about the human resources field. Amy tried to give me educational rather than simply administrative assignments and took the time to coach me through each of them. Under Amy's supervision, I also learned about the various dos and don'ts of writing resumes, preparing cover letters and interview etiquette. Moreover, I acquired many basic job skills such as learning how to work with others as a team and how to take initiative in the workplace that greatly

benefited me in subsequent internships and jobs. Overall, I believe that my internship at Hearst Magazines was a great stepping stone in the human resources field and provided me with a solid foundation for my future career.

9. Before I provided the information for this statement I was asked if I was represented by counsel (I am not) or intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that: my participation was completely voluntary; and that I would not receive any positive employment consequence or other benefit by participating. After hearing and understanding the above information, I made a voluntary decision to provide the information for this statement.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 30th day of December 2012, New York, New York.


ALYSSA AFUANG

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG and ERIN SPENCER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF ALESANDRA AJLOUNI

ALESANDRA AJLOUNI declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I am currently a senior at Michigan State University ("Michigan State"), completing a major in Marketing, a minor in Spanish and a specialization in International Business. I expect to graduate in 2013.
3. From late May to August 2012, I interned in the marketing department at Town & Country magazine. At the time of my internship, I had just completed my junior year at Michigan State. I applied for an internship with Town & Country because I really wanted to experience what it would be like to work at a major magazine in New York City. I had no prior magazine or publishing experience.

4. It was clear to me before I accepted the internship that it would be unpaid and that I needed to receive academic credit. I received three credits from Michigan State, and my school counted the internship as two classes (one in International Business, and one in Marketing). In order to fulfill Michigan State's academic credit requirements, I was required to complete an eight-page paper explaining what I had learned during the internship and perform some additional research for my International Business specialization. I also kept a journal throughout the internship so I could provide my academic advisor with a more detailed account of my experience. I received a "4 point" for the internship, which is the highest possible grade at Michigan State. The cost of the internship credits was included in my flat tuition.

5. Before I accepted the internship with Town & Country, it was also clear to me that there would be no guarantee of a job upon completion of the internship. I hoped that the internship might lead to professional references, but I knew that this would depend on my internship experience and the overall impression I made on my supervisors.

6. I interned at Town & Country five days a week from 9 a.m. to 5 p.m. I always took a one-hour lunch break, and I was given every other Friday off. I only stayed past 5 p.m. on one occasion because I had lost track of time and wanted to finish a project; my supervisors encouraged me to leave. My supervisors always allowed me to leave the office early on slower days. I was one of three interns in the marketing department, and one of five total interns at Town & Country that summer.

7. During the internship, my direct supervisors were Eliza Whetzel and Alexandra Prebul, who were then members of Town & Country's marketing team. I was also supervised at times by Jennifer Tucker, Susan Harrington and Freeda Fawal-Farah, who were also members of Town & Country's marketing department. Eliza and Alexandra were very involved supervisors

who gave me detailed and constructive feedback on the tasks I performed for them. I sat next to Eliza throughout the internship, and she was always happy to answer my questions throughout the day. Sitting next to Eliza also enabled me to observe her as she went about her daily work and get a better understanding of the day-to-day activities of the marketing department. I felt like Eliza and Alexandra were both invested in my growth.

8. The tasks I completed at Town & Country were often portions of larger projects and provided exposure to the various activities of the marketing department. The biggest project I assisted with was the Town & Country and Longines "Women Who Make a Difference" promotional campaign, which awards women who make a difference in children's lives through a charitable organization. I read and verified the nominations that were received and sat in on event-planning meetings with Town & Country marketing staff and the Longines board. Although I was invited to these meetings principally to observe and learn, whenever someone had a question about one of the nominees I tried to answer it since I was most familiar with the nomination files. I was very excited and honored to be part of this promotion.

9. At the time of my internship, Jay Fielden, Town & Country's recently appointed Editor-in-Chief, was attempting to broaden the magazine's male readership base. To assist with this effort, I was also given the task of conducting research about Town & Country's male readers: which regions they live in, how they spend their free time, and the different ways in which they are involved in their communities. I then researched stores and venues across the United States and contacted them to see if they would be interested in receiving complimentary issues of Town & Country for their male customers. Making professional calls and sending e-mails to people I had never met was something entirely new to me. I was nervous at first, but

over time I grew more comfortable with the task and I now know this is a necessary skill for many careers.

10. In addition to these larger projects, during my internship I assisted with venue research for client parties and events and shadowed Eliza and Alexandra in client meetings and on conference calls with sales representatives. I also attended the video component of a photo shoot for a promotion where the fashion director at Neiman Marcus discussed how to style clothing with jewelry for the holidays. I took notes during the shoot so that the key details could be incorporated into Town & Country's marketing campaign for the holiday issue. I had never attended a photo or video shoot before and I enjoyed learning about what goes on behind the scenes.

11. During my internship, I was also given the opportunity to attend Magazine University, a weekly magazine summer program held by MPA (the Association of Magazine Media, formerly Magazine Publishers of America), at Hearst's expense. This program was held every Wednesday during the summer from 9 a.m. to 12 p.m., and featured speakers from different departments of various magazines, such as sales, digital and editorial. The speakers were very generous with their time and encouraged us to reach out to them if we had any career-related questions. It was incredibly beneficial to learn about different aspects of the magazine business and to interact with interns and employees from other magazines, as this helped me expand my professional network and became more familiar with the magazine industry as a whole.

12. One of the most valuable lessons of my internship was witnessing how the Town & Country marketing team stays focused on the values and brand of the magazine as they go about their work. Town & Country has a strong, historical brand and in shadowing Eliza and

Alexandra, I learned how important it is to complete marketing tasks with brand values in mind. The internship also taught me how to handle myself in a professional manner and how to interact with people whose personalities are different from my own, which I'm sure will be useful in future positions.

13. I have also been able to apply the lessons of my Town & Country internship to my studies. In my program at Michigan State, we frequently complete projects in teams, and I've become a much better communicator since completing my internship. I present my ideas more effectively than before, and I also better understand how to allocate responsibilities and set expectations within a group. Additionally, my internship has been helpful in my marketing classes because I can now compare my personal experiences to what my professors are teaching.

14. Before I provided the information for this statement I was asked if I was represented by counsel (I am not) or if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that: my participation was completely voluntary; and that I would not receive any positive employment consequence or other benefit by participating. After hearing and understanding the above information, I made a voluntary decision to provide the information for this statement.

I declare under the penalty of perjury under the laws of the State of Michigan and the United States of America that the foregoing is true and correct.

Executed this 24 day of January 2013, East Lansing, Michigan.


ALESANDRA AJLOUNI

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF EDDIE ALTERMAN

EDDIE ALTERMAN declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration, or I have learned said facts to speak on behalf of Car and Driver magazine.

2. Hearst acquired Car and Driver from Hachette Filippachi Media in or about June 2011. I am the Editor in Chief of Car and Driver magazine, a position I have held for three years. Car and Driver's main office is located in Ann Arbor, Michigan.

3. Car and Driver is the leading source of information for auto enthusiasts/influencers and in-market car buyers. The magazine, with a total audience of 10 million readers, provides thorough evaluations and road tests across all segments of vehicles, as well as information on technology, motorsports, gear, and industry news. With web and mobile sites, iPhone/iPad apps, events, social media and digital products, Car and Driver is the world's largest automotive magazine brand.

4. Car and Driver does not have a paid internship program, nor has it had one in the past six years. Car and Driver also does not currently have any unpaid interns and, to my knowledge, has not had any unpaid interns since 2001.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 3 day of April 2012, New York, New York.


EDDIE ALTERMAN

EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG and ERIN SPENCER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF HANNAH ANDERSON

HANNAH ANDERSON declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I have worked for O, The Oprah Magazine since October 2011 as the Assistant Photo Editor. I assist the editors in the photo department with day-to-day tasks by planning and attending meetings, setting up photo shoots, gathering photographic images, and invoicing and other administrative tasks.
3. From June to August 2007 I interned at Harper's Bazaar magazine in the photo department. It was clear from my initial interview that the internship would be unpaid. I was a student at Ohio University at the time and received academic credit for my internship. My commercial photography program at school required at least one internship (I did a few) and I looked forward to gaining real world magazine experience. After I graduated in May 2008 and

completed a post-graduate internship at InStyle magazine, I applied for and was hired as the paid photo intern at O, where I worked from August 2009 through February 2010.

4. I interned at Harper's Bazaar 2 days a week and my hours were typically 10 a.m. - 6 p.m. with an hour for lunch. If I did not have an assignment my supervisors would encourage me to leave earlier than 6:00. During my paid O internship, I worked full-time, again typically from 10 a.m. - 6 p.m., and was paid minimum wage for all of the hours that I worked.

5. During my internship at Harper's Bazaar, I assisted the photo department with short-term photo or celebrity research projects by reviewing and printing images from particular websites or databases. My supervisors provided me with significant feedback and coaching about the usefulness for particular Harper's Bazaar stories of the images I provided. Moreover, I was able to observe them as they went through the process of selecting which images were ultimately used in the magazine. My supervisors also encouraged me to take the time to visit Studio D, Hearst's in-house photo studio, to witness its photo operations first-hand. From some of my projects I was able to gather up "tear sheets" of images that appeared in print for my portfolio, a take-away that is important for all editorial and creative department interns. The Harper's Bazaar internship was not at all demanding or stressful.

6. I believe the skills I developed during my internship were transferable to other publications or photo careers. In addition to the photo research skills that I developed, I learned about the general interactions between the different departments and was exposed for the first time to the environment of a large corporation and office building. Of course, these seem like baby steps now but at the time I had a lot to learn about dealing with different staff members. Moreover, I valued the skills I learned in my Harper's Bazaar internship because they were not taught in school. For example, even though my professors mentioned photo editing as a

potential career, it was vital for me to get a peek into that field in practice, to see how a magazine operates and what it would be like to work there.

7. After I graduated from college, I pursued additional paid internships to better prepare me for a career as a photo editor. As a paid photo intern at O, I generally assisted the photo department by scheduling messengers, selecting locations and planning the logistics for large photo shoots, assisting on set at photo shoots and selecting images for the magazine's "contributors" page. I also attended photo department meetings and felt like an active member of the team. As compared to my unpaid Harper's Bazaar internship, I had more responsibilities, there were greater expectations on my productivity and I was more accountable. I also felt that being paid took away some of the focus on learning and redirected it towards productivity. While I interacted regularly with photo editors at O, I spent more time working independently and taking on tasks on my own.

8. In my current role at O I hire and supervise one paid photo intern, whose responsibilities include copying, invoicing and other administrative tasks, attending departmental meetings, scheduling messengers, sending issues of the magazine to photo contributors, organizing catering and securing available studio locations for photo shoots. I do not believe O would hire for its paid internship the same inexperienced students that Harper's Bazaar selected for its program. There are two distinct levels of skill sets and when hiring interns at O, I look for someone with a strong background or interest in photography. Many applicants have already completed multiple internships.

9. Before I provided the information for this statement I was asked if I was represented by counsel (I am not) or if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to

me, including that: my participation was completely voluntary; no adverse employment consequence would result, and I would not be retaliated against in any way if I declined to participate; and that I would not receive any positive employment consequence or other benefit by participating. After hearing and understanding the above information, I made a voluntary decision to provide the information for this statement.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 4 day of January 2013, New York, New York.



HANNAH ANDERSON

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG and ERIN SPENCER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF CATHARINE ANDREWS

CATHARINE ANDREWS declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.

2. I graduated from Tufts University in May 2012 with an M.S. in Nutrition Communication. I am currently completing a dietetic internship – the final step to becoming a registered dietitian – at Massachusetts General Hospital. Prior to commencing graduate school, I worked at Lehman Brothers from March 2005 to April 2009 in institutional sales.

3. From June to August 2011, I interned in the nutrition department of the Good Housekeeping Research Institute (“GHRI”). At the time of my internship, I had just completed the first year of my two year master’s program at Tufts. I was required to complete an internship that complemented my academic study as part of my degree requirements. I applied for an

internship at GHRI because there aren't many internships that combine both nutrition and communication, and it seemed like a great opportunity to learn more about nutrition writing and how nutritional information is communicated in the media. I had my own blog that focused on nutrition information, so I also hoped to gain some writing experience.

4. It was clear to me before I took the internship at GHRI that it would be unpaid and that I would need to receive academic credit. In order to fulfill Tufts' internship requirements, I had to intern for a minimum of 400 hours and write a paper on my internship experience. My internship was included in my flat tuition. Before I took the internship, it was also clear to me that there would be no guarantee of a job after the internship, and I believed whether I received a reference would depend on how the internship went.

5. I interned five days a week at GHRI and my hours were generally 9 a.m. to 5 p.m. I was always encouraged to take a lunch break, though I sometimes chose not to do so. My supervisor was flexible about my schedule and was very accommodating about me taking days off during the internship.

6. I was closely supervised during my internship by Samantha Cassetty, the Nutrition Director at GHRI. Because I was doing a degree in nutrition writing and wanted to gain some writing experience, Samantha gave me the opportunity to draft short blog posts for the Good Housekeeping website on newsworthy topics in nutrition. For example, I drafted a blog post about the Environmental Working Group's newly-released "dirty dozen" list of fruits and vegetables containing pesticides, and posts for future use on healthy snack ideas for Halloween and the holidays. Samantha would edit each of the posts I drafted and then send them back to me so I could see the changes she had made. Although I had prior experience writing blog posts,

Samantha taught me a great deal about how to write concisely and how to target my writing for a particular audience. Not only was this helpful when I returned to school, but it will also be helpful in the future if I decide to pursue a writing-focused nutrition career.

7. In addition to drafting blog posts, I performed background research for articles that Samantha was writing, and fact-checked nutritional information in articles that were being prepared for print. I also helped Samantha with recipe development and research. The recipes I assisted with were generally small recipes, such as snack plates, parfaits and sandwiches, for Good Housekeeping magazine's "How to Lose 5 Pounds" column. Samantha would first come up with an idea for a recipe, and I would experiment with the ingredients. Samantha would often arrange for a tester to come and prepare the food, or we would prepare the food ourselves. We then tasted the food and measured the nutritional content and yield using specialized computer software. Based on the results, I would help Samantha tweak the recipes to increase their nutritional value. I had very little experience in testing recipes, and it was helpful to learn how a professional goes about this process. The knowledge I gained has been extremely useful in my current position as a dietetic intern, which involves a lot of food and recipe development.

8. When I started my GHRI internship, I told Samantha that I wanted to undertake some independent research during my summer to ensure I had the most educational internship experience possible. Samantha came up with two research projects for me that I spent time on throughout the summer. The first project was the most scientific, and involved setting-up a blind taste test of approximately 50 different brands of chewable vitamins. I then sent the products that were rated highest on taste preference to an independent laboratory to check the levels of Vitamin D, calcium and other vitamins they were said to contain. For my second project, I selected and ordered for a taste test approximately 50 frozen meals that were new to the market

and fell within specific nutrition parameters. I collected data during the tastings and, at the end, compiled a spreadsheet of the winners for Samantha. These projects were a great learning experience in original research, as I had never conducted or designed a taste test before.

Samantha provided me with extensive guidance along the way about how to conduct this type of research. I know a lot more about how to design research studies as a result of this experience, which will definitely be helpful for me in future jobs in the nutrition field.

9. My internship in the nutrition department at GHRI gave me a valuable glimpse into how nutrition is approached at a well-known and respected magazine. Not only did I gain more experience in nutrition writing, but the internship sparked my interest in nutrition research as a possible future career. My professors at Tufts were also very impressed by my GHRI internship and wanted to highlight my experience to current and incoming students.

Accordingly, when I returned to school in the fall, I was one of five students who were selected to present to the entire student body about our summer internships. I was the first student in recent years from my program at Tufts to complete an internship in the nutrition department at GHRI, but due to the great experience I had, other nutrition communication students have subsequently applied for and undertaken internships with Samantha. Overall, my internship at GHRI was a very unique experience and I would love to pursue a job in this type of environment in the future.

10. Before I provided the information for this statement I was asked if I was represented by counsel (I am not) or if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that: my participation was completely voluntary; and that I would not receive any positive employment consequence or other benefit by participating. After hearing and

understanding the above information, I made a voluntary decision to provide the information for this statement.

I declare under the penalty of perjury under the laws of the State of Massachusetts and the United States of America that the foregoing is true and correct.

Executed this 20 day of January 2013, Boston, Massachusetts.


CATHARINE ANDREWS

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG and ERIN SPENCER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF ALYSSA BAILEY

ALYSSA BAILEY declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I graduated from the University of North Carolina at Chapel Hill ("UNC-CH") in December 2012 with a degree in French and Journalism & Mass Communication, with a concentration in editing and graphic design.
3. In the summer of 2011, when I was a rising junior at UNC, I interned at Cosmopolitan magazine in the books department; in the summer of 2012, I participated in an editorial internship at ELLE magazine. It was clear from the original Cosmopolitan internship listing, and from my later ELLE internship interview, that my internships would be unpaid and that I would need to obtain academic credit. It was also clear to me that no jobs would result from the internships. I looked forward to the internships nonetheless both for the learning

experience and for the connections I hoped to make. As part of my graduation requirements at UNC, I needed to complete an internship or study abroad; my internship at Cosmopolitan fulfilled that requirement (I subsequently studied abroad as well). I also received credit for my internship at ELLE in 2012. Both internships were treated as a class, and I received one credit for each. In addition to spending time in the internships, to earn full credit I was required to write a book report, as well as a paper on the company and my internship experience. My internships were graded on a pass/fail basis, and I received a passing grade in each.

4. My internship at Cosmopolitan was meant to be three to four days a week; because I enjoyed being at the magazine so much, by the end of my internship I was voluntarily coming to the office five days each week. When I was in the office, my hours were typically from 9:30 a.m. to 6 or 6:30 p.m. My supervisors at Cosmopolitan were insistent that I take a one-hour lunch break every day; if they saw that I was in the office after six, they encouraged me to leave. Those days when I stayed later were always by choice.

5. When I started at Cosmopolitan, I had no experience in the New York magazine world, but the knowledge I gained during the internship far exceeded any expectations I had. I was supervised at Cosmopolitan by the Editorial Assistant at the time, Gabrielle Frank, and later by Editorial Brand Manager Susan Schulz and then-Deputy Editor Isabel Burton. Each served as a mentor to me, and created a wonderful learning environment by providing me with clear and detailed instructions for any task I was asked to do, always taking the time to explain the “how” and “why” of everything they did and everything I helped them to do, and serving as resources for any questions I had about the department and the magazine’s work. I felt that they truly invested in me, and tried to make the experience one that was educational and rewarding for me.

6. During my internship, I was able to gain exposure to a broad range of the department's activities, helping Gabrielle and the editorial staff with research and other projects, summarizing romance novels and identifying possible excerpts from those novels to include in the magazine's "Red Hot Reads" section, identifying Cosmopolitan-appropriate research studies for Isabel, and reviewing lists of upcoming book releases to help determine those that might serve as resources for future magazine content and obtaining copies of the selected titles from publishing houses. I was closely supervised in all these tasks. For example, when helping with the "Red Hot Reads" excerpts, an editor would review the titles that I thought might be appropriate for the magazine and discuss with me whether they worked, and make their own editorial decisions about which to include. I was also able to pitch ideas for stories, including for the "Shameless Money Saving Tips" page and the weekend section.

7. During my summer at Cosmopolitan, I was also able to participate in the "Cosmo U" program. Cosmo U brought in a different editor each week, including then-Editor-in-Chief Kate White, to discuss his or her work and career. Cosmo U was a great way to get to know each part of the magazine and understand how they fit together, ask questions of people at the top of their field, and receive valuable career and life advice.

8. My internship at Cosmopolitan taught me so much. At Cosmopolitan, I refined my ability to communicate with publicists by phone and email, and my professional email skills in particular improved tremendously. My internship also taught me to be comfortable asking questions so that I had the confidence that I could get things right the first time, and not to be afraid to find and pitch good ideas. I also believe that my internship at Cosmopolitan truly taught me to encompass the values of the magazine by being bolder and more fearless in everything I do.

9. I certainly felt that I was more confident in everything I did after my internship at Cosmopolitan, including in my internship at ELLE. I valued my experience so much, in fact, that I turned down the opportunity to be a paid intern through the American Society of Magazine Editors (“ASME”) internship program so that I could intern at ELLE — always a dream of mine — in the summer of 2012.

10. I spent four days a week at ELLE, generally from 10:00 a.m. until 6:00 or 6:30 p.m. (I was always told to leave at 6:00). As with my internship at Cosmopolitan, I found my time at ELLE so enjoyable, that I wanted to spend five days a week at the magazine, and I did so when possible.

11. I was supervised at ELLE by then-Editorial Assistant Allison Davis. Although equally educational, my time at ELLE was spent in very different ways from my time at Cosmopolitan. At ELLE, I was able to see how a features article takes shape from start to finish, from the initial research that is conducted about an interview subject to the interview transcript itself, to hearing about rough drafts and finally (once the relevant issue came out) reading the printed article. Allison and the editors taught me how to do research on and create “clip packets” about interview subjects (including where to find information, and which sources were the best to use and why). I found transcribing interviews especially educational. Not only was I able to hear interviews in their entirety (something not only interesting but insightful in itself), I was also able to learn what questions and interview techniques were most effective, and how different editors use their own personality and interview style to put their subjects at ease. Listening to multiple interviews taught me different ways of presenting oneself professionally. I was also able to learn from the substance of each interview — about different people, cultural and other events — including far more than the magazine is able to include in the final article.

To complement the transcriptions I was doing, I asked to (and did) sit down with several editors and ask questions about their story process, including how they find fresh ideas and how they approach a given story. By seeing the process from transcript to the final article, and having the opportunity to speak to the staff directly about their process, I was able to learn how and why different editorial choices are made. ELLE also had a weekly speakers program that brought together editors and other staff from across the magazine to meet with interns, talk about their work and careers, and answer any questions the interns had.

12. I felt that my internship at ELLE provided me with the opportunity to learn from masters of the trade, who despite their busy schedules always gave me their undivided attention. I learned to be more comfortable with pitching my own ideas, something the editors at ELLE encouraged me to do, and to be proactive and professional in everything I do. I also always felt that any help I was providing was appreciated by the editorial staff.

13. I believe that my internships at Cosmopolitan and ELLE helped me upon my return to school each fall. My confidence as a student journalist surged, and I became more of a leader at the school newspaper and in my other activities. I was more organized, and was better able to juggle multiple tasks. I became a better mentor to other students interested in magazine journalism through my role as Vice-President (and later co-President) of UNC's chapter of Ed2010, a volunteer organization committed to helping students pursue careers in the magazine world. I believe I got a lot out of my internships, but each internship is unique and can depend on the intern and what he or she hopes to get out of it. I also believe the experiences I had and the connections I made during my internships at Cosmopolitan and ELLE will make me a more competitive candidate as I enter the job market.

14. Before I provided the information for this statement I was asked if I was represented by counsel (I am not) or if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that: my participation was completely voluntary; and that I would not receive any positive employment consequence or other benefit from Hearst by participating. After hearing and understanding the above information, I made a voluntary decision to provide the information for this statement.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 11 day of January 2013, New York, New York.


ALYSSA BAILEY

EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG and ERIN SPENCER, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF MOLLY BARKER

MOLLY BARKER declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I am currently a senior at Fordham University, where I study visual arts. I plan to graduate in May 2013. During the fall of 2011, I interned in the photo department at HGTV Magazine; in the spring of 2012, I interned at Hearst's in-house photography studio, Studio D. I was a junior at Fordham at the time. It was clear from the start of each internship that the internship would be unpaid and that I would need to receive credit from Fordham. I earned three credits from Fordham for each internship. In addition to completing the internships, to obtain credit I was required to write a paper describing my expectations for each internship before it began and what I had learned from the internship.

3. During my internship at HGTV Magazine, I spent one and a half days a week at the magazine, one day from 10:00 a.m. to 6:00 p.m. and the other from 10:00 a.m. to 1:00 p.m. I always had an hour off for lunch, and was permitted to leave before 6:00 when I needed to.

4. I was supervised at HGTV by Associate Editor Rachel Jacoby, Associate Photo Editor Rachel Barker, and Assistant Editor Rae McConville. I also worked closely with HGTV's Photography Director, Ann Davidson. For example under Ann's direction and guidance, I reviewed photographer's portfolios and selected images that I thought matched HGTV Magazine's aesthetics, and then added them to binders of that photographer's work maintained by Ann. After the first time I completed this task, Ann met with me to discuss my selections and helped me understand which photos worked for HGTV's look and brand voice, and which did not. I also learned how to conduct online photo research, and received feedback on the images I selected, as well as how to contact and communicate with publicists and others to obtain high-resolution images of products to be considered for publication in the magazine.

5. The HGTV team also provided me with the opportunity to attend a photo shoot at Hearst's Studio D at which a refurbished chest of drawers was being photographed for the magazine. Not only was I able to experience what it is like to be on set for a still life photo shoot and observe the roles of all participants, I also was able to assist with styling the product for the shoot, making the photo shoot a particularly fun and memorable experience.

6. The internship taught me many things I was unable to learn in classes at school. For example, I gained experience with the computer programs used in the publishing world, including Adobe's Bridge and Photoshop programs. I also learned the importance of an image's unique shadows, lighting and color, as well as how a particular image will fit on a page, to a magazine's choice of which photographs to publish. I also benefitted from just being in a creative environment all day. For example, I was constantly exposed to the editors' discussion and analysis of the proposed photos, art and layouts for the upcoming issue, giving me not only insight into the creative process, but also a sense of how the editors made all the decisions necessary to take an idea from concept to print. The internship also piqued my interest in learning how to set up lights and other equipment for photo shoots.

7. Thus, after I completed my internship with HGTV Magazine, based on the exposure I received at photo shoots, I told Rachel Barker I was interested in interning at Studio D. With the help of Rachel's reference, I was able to do so in the spring of 2012.

8. During my internship at Studio D, I spent two-and-a-half days a week at the photography studio. While at Studio D, I learned how to set up and break down sets for photo shoots, from setting up and adjusting lights, to adding the appropriate paper or "v-cards" to create the desired shadow or light effects. When I was not attending a photo shoot, I would help with non-essential tasks in the studio, such as tagging magazines that contained photographs from Studio D to create a record of those photographs completed in-house versus out-of-house.

9. A large part of my Studio D internship was spent shadowing photographer Philip Friedman. Philip took me under his wing, and I followed him around all day. Being able to watch a professional photographer on set during a shoot from start to finish was invaluable to me. By doing so I received extensive exposure to and training in all aspects of a photo shoot, from setting up equipment to styling the shoot to taking photographs. Among many other things, by shadowing Philip on his shoots I learned some of the fine points unique to still life photography, such as the proper way to pour liquid into a scene to achieve certain effects. I learned how to style models and still-life subjects, and gained confidence in my own attempts to do so. I also learned how to conduct myself on a crowded set. Now I know how to act, what to say, and how to interact with all of a shoot's staff, from hair and makeup artists to stylists to models to the photographers. Phillip always answered any and all questions I had, and it was clear to me that he wanted me to have a positive educational experience during the internship and grow my skills, something for which I am immensely grateful.

10. From my time at HGTV Magazine and Studio D, I realized that my primary interest lies not in the production side of a magazine, but in styling for photo shoots. And my extensive experience at Studio D learning how to set up equipment for a shoot has been useful in my course work at Fordham. For example, Fordham makes lighting equipment available to students for use on assignments and to help build student portfolios. Before my internship, I didn't have the knowledge to make use of it. After I completed the internship, however, I better understood how lighting and shadows function in a photo.

11. Before I provided the information for this statement I was asked if I was represented by counsel (I am not) or if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that: my participation was completely voluntary; and that I would not receive any positive employment consequence or other benefit from Hearst by participating. After hearing and understanding the above information, I made a voluntary decision to provide the information for this statement.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 26 day of December 2012, New York, New York.

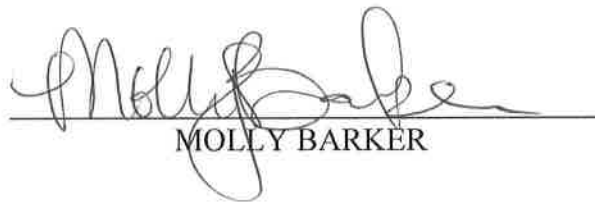

MOLLY BARKER

EXHIBIT 9

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

THE HEARST CORPORATION,

Defendant.

ECF

Civil Action No. 1:12-cv-00793-HB

DECLARATION OF MARIA BAUGH

MARIA BAUGH declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration, or I have learned said facts to speak on behalf of Food Network Magazine.
2. I have been Managing Editor of Food Network Magazine since approximately January 2010. My position touches on everything that is necessary to keep the magazine functioning on a day-to-day basis, and everything necessary to get the magazine published on time and on budget. I also manage the magazine's 23 staff members. Since I have been Managing Editor of Food Network Magazine, the magazine has not had a paid internship program and to my knowledge it has never had a paid internship program. I am familiar with the magazine's unpaid internship program.
3. The magazine's internship program operates on a semester-based schedule, with interns participating during the Fall, Spring and Summer semesters. During each semester, there

are usually 2–3 interns in the Editorial Department, 1 intern dedicated to the Photo Department, and 1 intern dedicated to the Art Department. Generally, the interns spend one semester at Food Network Magazine, though there may be occasions where an intern spends two consecutive semesters at the magazine.

4. A prerequisite to participation in the magazine's unpaid internship program is that the intern will receive credit from his/her college or university. For example, at the beginning of this semester, an intern reported to the office on her first day and because there was an issue with the intern's paperwork related to receiving college credit, the intern was sent home and was not permitted to begin the internship until the college credit was sorted out.

5. Interns are made aware that they are not entitled to a job with the magazine at the conclusion of their internships, and they understand the internship is unpaid.

6. Each intern sets his or her internship schedule at the beginning of the semester. Each intern's schedule is different, as it is set based on the intern's class schedule and availability. Typically, an intern comes in to the office 2 or 3 days a week on a part-time schedule. The number of hours per week that the interns spend in the office varies by intern. Depending on the number of interns at the magazine, and the availability of each, there may be days during the week in which there is no intern present at the magazine.

7. Each of the three departments at Food Network Magazine, Editorial, Photo and Art, has its own application and selection process for its interns. Each department has its own set of criteria for selecting its interns, chooses where to post listings for the internship, interviews its candidates and ultimately selects the individual(s) for the internship. Although each department chooses where to post listings, I know that generally, internship openings are posted on area college job boards or listserves and industry websites like Media Bistro and the Society of

Publication Designers. The magazine also receives internship applications through word of mouth and referrals.

8. The specific duties performed by the interns vary depending on the departments to which they are assigned. There is no “head intern” – all interns operate on the same level.

9. Tasks are assigned to Editorial interns based on their availability. The tasks performed by the Editorial interns vary day-to-day, all of them geared towards providing the interns with a view into how magazine operations work. Among other things, Editorial interns conduct research for the “Food News” section of the magazine, and may pitch ideas for that section. Interns participate in the “pre” ideas meeting, where editors work with the deputy editor to prepare their pitches for the Editor-in-Chief. This allows the intern to gain an understanding of what goes into the story development process. Editorial interns also sit in on Editorial status meetings. In addition, we try to arrange it so that each intern attends a photo shoot during his/her internship, to give him/her experience with this piece of the editorial process. Through experiences like these, Editorial interns gain valuable insight into the story development process and various decision-making processes involved.

10. The Art Department intern duties generally relate to the production and design aspects of the magazine. These tasks include designing pages for the magazine, though not for feature stories, and attaching text. Recently, I asked an Art Department intern to assemble the monthly map of the magazine. Designing pages and receiving feedback help the Art intern develop his/her design skills and an understanding of what works in a page layout and why. As with the Editorial interns, I like the Art intern to attend a photo shoot at least once during the semester.

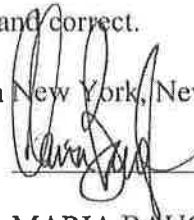
11. The Photo intern may assist at photo shoots, and does research to find images and art to illustrate articles. Interns may assist the photo assistant to organize the magazine's prop closet. The Photo intern gains valuable skills, such as understanding how a photo shoot works from start to finish, what goes into selecting a photographer, and how best to illustrate a story.

12. An internship with Food Network Magazine is a fantastic opportunity for an intern to see and experience the magazine publishing industry from the inside. Interns gain practical skills they learn and develop as a result of the meaningful assignments they are given. The interns develop an understanding of the whole process that goes into putting a magazine together, how meetings work, how the production schedule is developed and executed, and the various decision-making processes that are involved. In addition, the internship provides the interns with the extremely valuable opportunity to meet people and make connections in an industry that can be hard to break into.

13. As a hiring manager, if I were reviewing a stack of resumes and one candidate had internship experience at a magazine – any magazine – that resume would move to the top of the stack over those who had no magazine experience. The magazine publishing industry is unique and experience in that work environment is hugely beneficial.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 2nd day of April 2012, in New York, New York.

A handwritten signature in black ink, appearing to read 'Maria Baugh', is written over a horizontal line.

MARIA BAUGH

EXHIBIT 10

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

XUEDAN WANG, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

Civil Action No. 1:12-cv-00793-HB

THE HEARST CORPORATION,

Defendant.

AFFIDAVIT OF DOUGLAS BAUGHMAN

DOUGLAS BAUGHMAN declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration, or I have learned said facts to speak on behalf of ELLE magazine.

2. I have been the Managing Editor of ELLE ("ELLE" or the "magazine") since June 2010. ELLE does not have a paid internship program and to my knowledge it has never had a paid internship program. In my role as Managing Editor, I am familiar with ELLE's unpaid internship program.

3. Hearst acquired ELLE from Hachette Filippachi Media in or about June 2011. ELLE is the number one fashion magazine worldwide for women, with 23 million readers globally and 44 editions across more than 60 countries. ELLE inspires women to explore and celebrate their own style in all aspects of their lives. With its smart, irreverent take on fashion,

beauty and pop culture, the magazine is at once aspirational and accessible, encouraging readers to cultivate not just personal style and self-expression, but the success that comes with personal power.

4. At ELLE we have three “semesters” of interns; Spring, Fall and Summer.

Summer is our biggest internship semester, during which we have approximately 30 interns in various departments. In the other two semesters, we generally have half as many interns. Most interns train two to three days a week; although, during the summer we have some interns who are with us five days a week. Even if they are at the magazine five days per week, however, interns do not spend long hours at the magazine. If they are in the office past 5:30 or 6:00 p.m., it is because they’re socializing.

5. Of all of ELLE’s departments, fashion/accessories has the most interns.

However, there is no “Head” or lead intern. The other “editorial” (as opposed to publishing) departments, including beauty and editorial, each have one to two interns per semester. Interns are closely supervised by mid-level editors in the respective department to which they are assigned.

6. I like to believe I run a tight ship as far as ELLE’s internship program is concerned. All of our internship postings specify that the internship is unpaid and that the candidate must be receiving school credit to be eligible for the internship. All interns understand the internship position is unpaid, and they also understand they are not entitled to a job at the internship’s conclusion. As well, I am adamant about advising editors that interns must be spending their time on non-menial tasks that give them exposure and insight into how a premier fashion magazine like ELLE functions.

7. I also am sure to meet with each and every intern at the beginning of each semester's internship program. In the beginning of the semester, I get a list from all of my editors of the interns training in their departments. I then sit down with each intern, for anywhere up to 20-30 minutes per meeting, to discuss the intern's schooling, what she is studying and what her objective is for the internship, namely what she hopes to get out of the internship and how she plans to use it for her career objectives. We then use this information to try and craft an internship experience that aligns with the intern's goals.

8. My assistant manages the editorial interns' daily activities. Among other editorial and administrative functions, interns assemble a "black book," which is a binder that contains every proposed page of the upcoming issue of the magazine in folio order. By doing this task, interns gain familiarity with ELLE's pages and design, and get overall insight into the editing process as different pages are removed, edited and replaced as the particular issue is being prepared and finalized. Of course, during the process, they receive guidance and assistance from the staff. The process of putting together the black book with interns can take twice as long as when one of the editorial assistants does it herself because she must walk the interns through the process. Because we need to spend more time providing input or direction when having an intern perform a task, our staff puts in more work when there are interns involved. Editorial interns also may write clips for elle.com and have the opportunity to submit ideas.

9. Beauty interns liaise with public relations firms to secure product for photo shoots and consideration in stories, research products for stories and transcribe simple or short beauty interviews. Our beauty department does a lot of "editor test drive" stories where editors try out new beauty products or devices, and interns will perform research and compile it for editors. Beauty interns also get the opportunity to interact with, and observe interactions between, editors

in different departments, getting access to, for example, not only the beauty editors and director, but also the photo editor. For instance, interns can sit in on “collaboration” meetings; so, if the magazine is doing a piece on different nail polishes, the beauty intern will collect and arrange the product (having been told the angle of the story and what types of polishes are being featured) and will then sit in on the meeting where the beauty director and photo/design editor reviews the selection and edits it down based on what will look good on the page. The intern gets the opportunity to hear why the photo/design editor is making a certain aesthetic choice, i.e., deciding to do a “spill” of certain colors as opposed to featuring them in the bottle because the color will be more vibrant, and then see the page come to fruition. Beauty interns also shadow beauty editors and our Beauty & Fitness Director at “desksides,” where they preview new products, and attend several beauty events per semester, such as fragrance launches or new make-up collaborations.

10. We like to consider ELLE’s beauty coverage to be “smart” beauty; we focus on the science of beauty, and this distinguishes our beauty department and therefore, the tasks performed and insight gained by our beauty interns. Although many magazines have beauty features and columns, we come at it from a different voice, looking deeper than the surface of a product and inquiring about ingredients. For example, if a magazine is doing a piece on bronzers, they may limit their coverage to what shade looks best for a summer “glow.” Our coverage, on the other hand, will delve into more in-depth studies of what bronzers have SPF and why SPF works or does not provide full protection. When an intern is transcribing an interview or sitting in on a “deskside,” the interns will observe and hear what type of questions our editors ask about the science behind the product, such as the skincare or dermatological aspect.

11. Fashion/Accessories interns are responsible for indexing and organizing product coming in and out of ELLE's fashion closet. When the semester starts off with fashion week, they help us RSVP for shows and plan schedules. When interns are organizing, coordinating and cataloging clothing and accessories samples, fashion and accessories interns learn the editing process and also come to understand the importance at a premier fashion magazine like ELLE of getting the exact right shoe, handbag or jacket; the distinction can be the difference of having a certain product on the cover or not. Unlike some fashion publications, our readers have a certain fashion aesthetic and expect the highest caliber clothing and accessories gained from ELLE's back stage access at fashion shows. Our fashion interns, although they may perform some of the same duties as fashion interns at other magazines, are dealing with the most exquisite items and interacting with the top editors, public relations individuals and photographers in the fashion industry. Our Creative Director, Joe Zee, is extremely well-respected, and our Style Director, Kate Lanphear, is a street-style star who is widely covered in the press for her fashion sense; the opportunity to interact and have access to these editors, and to observe and understand how they are directing the fashion of the magazine is incomparable.

12. Fashion interns also prepare documents that the fashion department uses for photo shoots and do research for fashion shoots and features. Each issue has five to six photo shoots (not including the front of book shoots and minor shoots) and we use an excel sheet to track the looks requested by the stylists and a pdf file of pictures of the looks. Interns maintain these two documents and keep our editors updated if something is missing. This task allows them to see first-hand how the shoots come together and to understand the amount of product and merchandise that is required for the stylist to have enough options and variety for the shoots. Interns then may have the opportunity to attend the photo shoot where they observe and assist

stylists, allowing them to see how the looks come together in the shoot, gain exposure to the nuts and bolts of how a shoot runs and witness the interaction between the stylist, the photographer and the talent or models.

13. Fashion/accessories interns may also do inspiration research for a photo shoot or feature, where they are given a topic, such as a specific style, place or person, and then find corresponding images. For example, if the inspiration is Gloria Steinem, the interns will collect images of Ms. Steinem showing her at different stages, how she wore her sunglasses, etc. Editors will give interns feedback and send them to do additional research if the images are not suitable. Interns then get to see the product coming in that will be photographed for the story and how it represents the images they found and brings the inspiration to life.

14. I believe it's important for the magazine to have interns because it's an excellent opportunity for young people to develop crucial skills that will prepare them for full-time employment. The magazine industry is very collaborative, and interns learn the importance of working collectively with others and being part of a team where everyone pitches in on all tasks, big and small. Most of our employees have had some internship experience. When reviewing candidates for full-time staff positions, it always to see that an applicant has had an internship because it indicates that he or she has had experience in the magazine culture and understands the infrastructure of a creative and editorial process.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 3 day of April 2012, in New York, New York.


DOUGLAS BAUGHMAN